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** Pro Hac Vice Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH, Individually
and as Parent and Legal Guardian of W.W.,
K.W., G.W., and L.W., minor children, and
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

PLAINTIFFS' MOTION TO EXTEND THE DEADLINE FOR
EXPERT DISCLOSURES

Plaintiffs, Stephanie Wadsworth, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children, and Matthew Wadsworth, by and through the undersigned counsel, hereby file this Motion to Extend the Deadline for Expert Disclosures as follows:

1. Pursuant to Fed. R. Civ. P 26(a)(2) and U.S.D.C.L.R. 26.1(e), the parties shall designate expert witnesses, providing a complete summary of the expected testimony from each expert. As outlined in the Order on Initial Pretrial Conference served on November 1st, 2023, Plaintiffs were given a Designation deadline of June 14, 2024, and Defendants, July 31, 2024.

2. Plaintiffs respectfully request an extension of these deadlines of 30 days each due to conflicts involving trial settings in other matters that prevent Plaintiffs' expert from having the time and ability to prepare, conference, and otherwise be available to consult on this matter.

3. Specifically, Plaintiffs' expert is facing conflicts due to trials relating to the Maui Fires, which were recently set to commence between now and June 2024.

4. Counsel for Plaintiffs has communicated with counsel for the Defendants regarding this requested extension, and he has expressed no objection to the proposed extension.

5. If granted, the extension would result in new deadlines to designate/disclose expert witnesses of July 14, 2024, for Plaintiffs, and September 13, 2024 for Defendants.

6. This request is made in good faith and with no intent to delay the process.

WHEREFORE, Plaintiffs respectfully request entry of an Order granting this Motion to Extend the Deadline for Expert Disclosures as stated herein, and all other relief deemed just and appropriate.

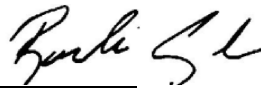
This Motion has been reviewed and approved by Opposing Counsel:



Eugene M. LaFlamme, Esq. (*For all Counsel for Defendants*)
McCoy Leavitt Laskey, LLC.
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Date: May 13, 2024

Respectfully Submitted,



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And,

/s/ Taly Goody

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 13, 2024, a true and correct copy of the foregoing was electronically served to all counsel of record.

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